



Proskauer Rose LLP Eleven Times Square New York, NY 10036-8299

April 22, 2020

**By ECF**

Hon. Jesse M. Furman  
United States District Court Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Neil H. Abramson  
Member of the Firm  
d +1.212.969.3001  
f 212.969.2900  
nabramson@proskauer.com  
www.proskauer.com

Re: *NYSNA v. Montefiore Medical Center*, 1:20-CV-03122 (JMF)

Dear Judge Furman:

Pursuant to the Court's Individual Practices in Civil Cases, Section 6(C)(ii) and Section 6 of SDNY's Electronic Case Filing Rules & Instructions, Defendant respectfully submits to the Court this letter motion jointly with Plaintiff to file the attached documents under seal. There are two sealed documents attached to this letter: first, an attached letter from Defendant regarding the selection of a mediator in the above referenced case; second, an attached letter from Plaintiff regarding the selection of a mediator in the above referenced case. The Parties seek to file both under seal. Plaintiff's counsel has informed the undersigned that they join this request in its entirety.

The Parties request to file these documents under seal as they contain sensitive information regarding the bargaining relationship between NYSNA and Montefiore and the routine selection process for arbitrators and mediators is normally performed *ex parte* and not publicly known specifically to preserve the neutrality of those arbitrators and mediators that are not selected in any particular matter for future matters.

For these reasons, the Parties request to file the attached letters under seal.

Dated: April 22, 2020

Respectfully submitted,

/s/ Neil H. Abramson

cc: All Counsel of Record